

EXHIBIT 1

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DREW J. RIBAR, Pro Se Plaintiff

3480 Pershing Ln

Washoe Valley, NV 89704

(775) 223-7899

Const2Audit@gmail.com

v.

WASHOE COUNTY, et al.

Defendants.

Case No.: 3:24-cv-00526-ART-CLB

EXHIBIT 1

Title: Internal Communications Regarding Additional Security and Staffing for Drag

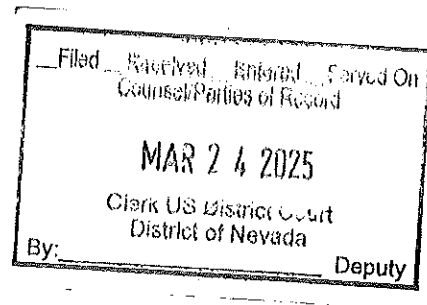
Queen Story Hour (DQSH) – Sparks Library

Date: May 12, 2022

Source: Internal email correspondence among Washoe County Library System officials

Bates Number Range: EXH001-EXH005

PLEADING TITLE - 1



1 **Description:**

2
3 This exhibit consists of an internal email conversation among Washoe County Library System
4 officials, including:

- 5
6 • **Joan Dalusung (Assistant Director)**
7 • **Leah J. Burton**
8 • **Lorna Grasso**
9 • **Jeff Scott (Library Director)**
10 • **Beate Weinert**
11 • **Melisa Garcia**
12

13
14 The discussion concerns:

- 15 1. **Staffing approvals** for the Drag Queen Story Hour (DQSH) event at Sparks Library.
16 2. **Waiving bureaucratic forms** to expedite BOC-related event approvals, demonstrating
17 preferential treatment.
18 3. **Instructions directing that DQSH-related approvals be sent directly to Jeff Scott,**
19 bypassing standard procedures.
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24 **Relevance to the Case:**

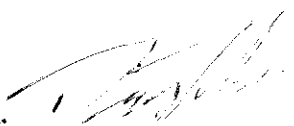
- 25
26 • **First and Fourteenth Amendment Violations**
27
28

- Confirms viewpoint-based favoritism toward BOC-affiliated events, reinforcing the claim of **unconstitutional discrimination and unequal access**.
- Supports **state actor liability** by showing joint action between Washoe County Library System and BOC.
- **Monell Liability Under 42 U.S.C. § 1983**
 - Establishes a **policy directive** from Washoe County Library leadership, implicating **Washoe County under Monell v. Dept. of Social Services, 436 U.S. 658 (1978)**.
 - Demonstrates **top-down involvement in setting unconstitutional policies**.
- **Refutation of Defendants' Arguments**
 - Undermines **BOC's claim that it is a private entity not subject to constitutional restrictions** by proving **coordinated government involvement**.
 - Provides **direct evidence of selective enforcement** in favor of a private entity, relevant to **due process and equal protection claims**.

CERTIFICATE OF SUBMISSION

I, **Drew J. Ribar**, certify that the attached **EXHIBIT 1** is a true and correct copy of internal communications obtained from Washoe County Library System records. This exhibit is submitted in compliance with **Fed. R. Civ. P. 26** and **local court rules**.

Dated: March 17, 2025



1 /s/ **Drew J. Ribar**

2 Drew J. Ribar, Pro Se

3 3480 Pershing Ln

4 Washoe Valley, NV 89704

(775) 223-7899

Const2Audit@gmail.com

From: Dalusung, Joan <JDalusung@washoecounty.gov>
Sent: 12 May 2022 16:05
To: Burton, L.J.
Cc: Grasso, Lorna; Scott, Jeff
Subject: Re: Additional body for DQSH at Sparks
Attachments:

Sure thing! I'm sure they'll be thrilled at one fewer form to complete. 😊

Thanks!

- Joan

Joan Dalusung

Assistant Director | Washoe County Library System
jdalusung@washoecounty.gov | Office: 775.327.8345
301 S. Center St., Reno, NV 89501

From: Burton, Leah J. <LJBurton@washoecounty.gov>
Sent: Thursday, May 12, 2022 6:27 AM
To: Dalusung, Joan <JDalusung@washoecounty.gov>
Cc: Grasso, Lorna <LGrasso@washoecounty.gov>; Scott, Jeff <jscott@washoecounty.gov>
Subject: RE: Additional body for DQSH at Sparks

Thanks Joan; would you mind letting the managers know at your next meeting? We will also let anyone who sends the old form in know that it's not needed anymore and ask them to email Jeff for approval instead.

EXH001

Leah

From: Dalusung, Joan <JDalusung@washoecounty.gov>;
Sent: Monday, May 9, 2022 7:35 PM
To: Burton, Leah J. <LJBurton@washoecounty.gov>;
Cc: Grasso, Lorna <LGrasso@washoecounty.gov>; Scott, Jeff <jscott@washoecounty.gov>;
Subject: Re: Additional body for DQSH at Sparks

This sounds great to me! Easier for all.

Thanks!

- Joan

Sent from my iPad

On May 9, 2022, at 7:25 PM, Burton, Leah J. <LJBurton@washoecounty.gov> wrote:

Hi Joan,

We were discussing this with Jeff last month, and have been thinking we could probably discontinue use of the LWOP/Extra Time Request form. I checked with Payroll and they did not recognize that form; perhaps it was an internal document created by Tami in the past to make sure the proper parties were notified. At any rate, it isn't a document required by Payroll.

In most cases, a supervisor or manager has already emailed as soon as they became aware of a need for comp or LWOP, and Jeff has replied with his approval (or denial). An email is sufficient documentation of Jeff's approval, so routing the form around for multiple signatures after this is not really necessary, and sometimes results in a duplication of efforts (example: Jeff ends up signing these forms more than once if a branch both scans/emails as well as following up with a hard copy via interoffice mail).

Our suggested new procedure:

- Employee notifies supervisor and/or Branch Manager via email as soon as they are aware there will be a need for Comp or LWOP (or submits a retroactive request, for example, in situations like alarm calls where a manager or supervisor has to go back after hours). A brief explanation of the reason for the request should be included.
- If supervisor or Branch manager approves, they forward the email chain to Jeff for his review, CC:ing Lorna and I.
- Jeff responds, CC:ing Lorna and I, to let everyone know whether the request is approved or denied. Lorna keeps the email electronically for payroll purposes.
- Employee records the extra time or LWOP for that pay period, and supervisor reviews the timesheet & approves as usual.

Please let us know if you have any questions or concerns about this suggested change.

EXH002

Thank you!

Leah

From: Grasso, Lorna <LGrasso@washoecounty.gov>
Sent: Friday, May 6, 2022 4:51 PM
To: Dalusung, Joan <JDalusung@washoecounty.gov>
Cc: Burton, Leah J. <LJBurton@washoecounty.gov>
Subject: RE: Additional body for DQSH at Sparks

Joan, this is something we have been discussing with our own team as we seem to get them in different ways. Leah will have to jump in on this but if they come through interoffice, Cece or Marilyn do take them to Jeff to sign and then scan them to me and I just file them in case there are any questions down the road. We have had some sign and scan them to us and then we scan to Jeff to sign, which works as well.

Lorna L. Grasso
Administrative Secretary | Washoe County Library System
lgrasso@washoecounty.gov | Office: 775.327.8344
301 S. Center Street, Reno, NV 89501

From: Dalusung, Joan <JDalusung@washoecounty.gov>
Sent: Friday, May 6, 2022 3:40 PM
To: Garcia, Melisa <MGarcia@washoecounty.gov>; Weinert, Beate <BWeinert@washoecounty.gov>
Cc: Jaeck, Sarah <SJaeck@washoecounty.gov>; Hansen, Judy <JHansen@washoecounty.gov>; Grasso, Lorna <LGrasso@washoecounty.gov>; Burton, Leah J. <LJBurton@washoecounty.gov>; Scott, Jeff <jscott@washoecounty.gov>
Subject: Re: Additional body for DQSH at Sparks

Hi all!

That's a great question. Ultimately, all comp time requests need to be submitted to Jeff on the attached form. He signs them and then I believe they go back to Lorna since she works with payroll.

*Lorna and Leah, what is the easiest way to work with these comp time approvals? I'm thinking perhaps Staff and Manager sign the hard copies, send them via courier to RN attention Jeff, he will sign and then they'll get back to

EXH003

Admin Clerical. Cece or Marilyn might pick them up, scan and send to you, Lorna. Does that work?

Thank you.

- Joan

Joan Dalusung
Assistant Director | Washoe County Library System
jdalusung@washoecounty.gov | Office: 775.327.8345
301 S. Center St., Reno, NV 89501

From: Garcia, Melisa <MGarcia@washoecounty.gov>;

Sent: Friday, May 6, 2022 3:32 PM

To: Weinert, Beate <BWeinert@washoecounty.gov>; Dalusung, Joan
<JDalusung@washoecounty.gov>;

Cc: Jaeck, Sarah <SJaeck@washoecounty.gov>; Hansen, Judy
<JHansen@washoecounty.gov>;

Subject: Re: Additional body for DQSH at Sparks

She can do 4 extra hours.

Méla

Melisa -Méla- Garcia
Librarian I - Sierra View Library - Washoe County Library System
mgarcia@washoecounty.gov | Office: 775.827.3232
4001 S. Virginia St., Reno, NV 89502

From: Weinert, Beate <BWeinert@washoecounty.gov>;

Sent: Friday, May 6, 2022 3:29 PM

To: Garcia, Melisa <MGarcia@washoecounty.gov>; Dalusung, Joan
<JDalusung@washoecounty.gov>;

Cc: Jaeck, Sarah <SJaeck@washoecounty.gov>; Hansen, Judy
<JHansen@washoecounty.gov>;

Subject: Re: Additional body for DQSH at Sparks

EXH004

Great, thanks Mela! Extra hours or comp time?

Joan-- how would you like everyone to submit their available staff and whether they need comp/extra hours/flex? Is this something Clerical keeps track of? Or the individual branches?

With Much Gratitude,
Beate

 Beate Weinert
Youth Services and Library Events Manager | Washoe County Library System
bweinert@washoecounty.gov | Office: 775.327.8361
301 S. Center Street, Reno, NV 89501

From: Garcia, Melisa <MGarcia@washoecounty.gov>
Sent: Friday, May 6, 2022 3:26 PM
To: Weinert, Beate <BWeinert@washoecounty.gov>
Cc: Jaeck, Sarah <SJaeck@washoecounty.gov>
Subject: Additional body for DQSH at Sparks

Howdy!

Jennifer Heath can be another body at SP for their Drag Queen Story Hour that Sunday, June 26th if they can use her help.

Méla

 Melisa -Méla- Garcia
Librarian I - Sierra View Library - Washoe County Library System
mgarcia@washoecounty.gov | Office: 775.827.3232
4001 S. Virginia St., Reno, NV 89502

EXH005